



# ORANGE COUNTY SHERIFF'S DEPARTMENT

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SHERIFF-CORONER  
SANDRA HUTCHENS

## OFFICE OF THE SHERIFF

December 30, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: CSSA Comment on Rates for Interstate Inmate Calling Services – Second Further Notice of Proposed Rulemaking (WC Docket No. 12-375)

Dear Secretary Dortch,

The Orange County Sheriff's Department (OCSD) appreciates the opportunity to comment on the FCC's proposed Rates for Interstate Inmate Calling (WC 12-375). Orange County, situated between Los Angeles and San Diego, is the third largest county in California and the sixth largest in the nation with a population of over 3 million in July 2013. The Orange County Sheriff's Department ranks as the third largest corrections system in California, with an average daily population of about 6,000 incarcerated individuals in five jail facilities.

California Penal Code Section 4025 statutorily mandates revenues generated from inmate telephone and commissary commissions be deposited into the Inmate Welfare Fund. These revenues are to be used for the direct benefit of inmates in the form of programs, enhanced medical services and recreation. The OCSD's Inmate Services Division supports our incarcerated population with opportunities for educational, vocational, cognitive behavioral therapy programs, workforce development, community re-entry, and life-skills programs. All programs are funded by inmate generated revenues, and not by taxpayer dollars. Services and programs are provided through collaborative efforts with a network of county partner agencies and the private community.

The current FCC proposal would drastically reduce the Department's Inmate Welfare Fund by 70% or 4.3 million dollars. As a result, most existing programs and services that benefit the incarcerated, their respective families, and the community would be eliminated. The loss of programs that target evidence-based approaches to aid incarcerated persons not to recidivate back into the correctional system would be devastating. The loss of the ability to fund programs which provide smart-justice methods of intervention could potentially bring harm to the community and separate families because of increased rates of incarceration in our community.

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Ms. Marlene Dortch

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Over the past 6 years, Orange County has benefitted immensely from training and consultation from the National Institute of Corrections in the development of science-based approaches in reducing recidivism. The County, through its criminal justice partners, has redesigned its array of correctional programs, instituted several methods and services to impact positive results, and cultivates positive change in our community.

The Orange County Sheriff's Department has formed partnerships with community groups, private enterprise and religious organizations that are helping to reintegrate our inmate re-entry population back into society. Additionally, we have partnered with our mental health private and public partners to provide ongoing services to assist our incarcerated population with wrap around services to help those released cope with post-custody difficulties. All of these programs and services would not exist without the commissions from the inmate telephones.

WC 12-375 will create a dire situation for both current and future developments that aid our community through inmate programming.

The Orange County Sheriff's Department strongly opposes the approval of WC 12-375 based upon the negative impacts anticipated to our incarcerated population, their respective families and the community.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sandra Hutchens', is written over the printed name.

Sandra Hutchens  
Sheriff-Coroner

SH / bf